



MEMO ENDORSED

U.S. Department of Justice

United States Attorney
Southern District of New York

United States District Courthouse
300 Quarropas Street
White Plains, New York 10601

September 4, 2020

BY ECF

The Honorable Kenneth M. Karas
United States District Judge
Southern District of New York
300 Quarropas Street
White Plains, New York 10601

Re: *United States v. Jonathan Jimenez et al.*, 19 Cr. 856 (KMK)

Dear Judge Karas:

The Government writes to respectfully request an exclusion of speedy trial time. Defense motions were initially due July 24, 2020. On July 24, 2020, Your Honor granted a motion to extend the due date to August 14, 2020, and excluded time until that day. On August 17, 2020, Your Honor granted a subsequent motion to extend the due date to August 28, 2020, and excluded time until August 31, 2020.

The August 28, 2020 deadline has passed and none of the defendants have filed a motion. Accordingly, the Government respectfully requests that the Court schedule a conference or trial date, and that the Court exclude the time from August 31, 2020 to the date of the next conference (or of trial) under the Speedy Trial Act, 18 U.S.C. § 3161(h)(8)(A), in the interests of justice. Defense counsel consent to the exclusion of time.

The next conference will be October 2, 2020 at 11 am. Time is excluded until then, in the interests of justice, to allow Defendants to prepare their defense. The interests of justice from this exclusion outweigh Defendants' and the public's interest in a speedy trial. See 18 U.S.C. Section 3161(h)(7)(A).

So Ordered.

9/10/20

Respectfully submitted,

AUDREY STRAUSS
Acting United States Attorney

By:

/s/ _____
Jim Ligtenberg
Assistant United States Attorney
(914) 993-1953

cc: All counsel (by ECF)